

Message

---

**From:** Levine, Bradley (ENRD) [Bradley.Levine@usdoj.gov]  
**Sent:** 10/18/2021 2:46:44 PM  
**To:** Lazos, Pamela [Lazos.Pamela@epa.gov]; Maslowski, Steven [Maslowski.Steven@epa.gov]; Nanda, Sushila [Nanda.Sushila@epa.gov]; Kardeman, Lianna [Kardeman.Lianna@epa.gov]  
**Subject:** FW: CRW - Additional Deliverables  
**Attachments:** DRAFT - crwoutfallactivationmemo - PGjtr review 101521.docx; DRAFT - crwinletprogrammemo100821 PGjtr review 101521.docx; DRAFT - crwplanningareainfo100821 PGjtr review 101521 Reduced Size Exhibits.docx

Privileged & Confidential Attorney Client Communication

Team,

See the attached comments from Tom R.

Thanks,  
Brad

Bradley L. Levine  
Senior Attorney  
Environmental Enforcement Section  
Environment & Natural Resources Division  
U.S. Department of Justice  
Work: 202-514-1513  
Mobile: 202-305-5884

<u>First Class Mail</u>	<u>Express Mail</u>
P.O. Box 7611	150 M. St. N.E.
Washington, DC 20044	Room 2.900
	Washington, DC 20002

---

**From:** Tom Rowlett <Tom.Rowlett@pgenv.com>  
**Sent:** Sunday, October 17, 2021 12:21 PM  
**To:** Levine, Bradley (ENRD) <Bradley.Levine@usdoj.gov>  
**Cc:** Lisa Rowlett <Lisa.Rowlett@pgenv.com>  
**Subject:** [EXTERNAL] RE: CRW - Additional Deliverables

Attached are draft reviews of three of the five documents that accompanied this e-mail. PGs review remarks are presented as comments to the document text. The file "crwplanningareainfo 100821" was converted from an Adobe document to a WORD document for comment entry and Exhibits were reduced in size to facilitate e-mailing. These Exhibits can be reexpanded to their original size by clicking on them and using the margin arrows to increase their size.

PG has no comments on the documents entitled: "crwawtfcapitalprojectinfo100821" and "crwawtffuturecapitalprojects100821"

Tom Rowlett

**PG Environmental**  
4126 Bottiglia Avenue  
Las Vegas, Nevada 89141  
702-361-3901 (land line)  
702-373-6151 (cell phone)  
[tom.rowlett@pgenv.com](mailto:tom.rowlett@pgenv.com)

IMPORTANT: This transmission is intended only for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If the reader of this transmission is not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this transmission or its contents is strictly prohibited. If you have received this transmission in error, please notify us by telephoning and return the original transmission to us at the address given above

---

**From:** Ahearn, Devon (ENRD) <Devon.Ahearn@usdoj.gov>

**Sent:** Friday, October 8, 2021 3:11 PM

**To:** Kardeman, Lianna <Kardeman.Lianna@epa.gov>; Lazos, Pamela <Lazos.Pamela@epa.gov>; Levine, Bradley (ENRD) <Bradley.Levine@usdoj.gov>; Maslowski, Steven <Maslowski.Steven@epa.gov>; Nanda, Sushila <Nanda.Sushila@epa.gov>; Tom Rowlett <Tom.Rowlett@pgenv.com>; Dawn Herb <dherb@pa.gov>; Janna Williams <jannwillia@pa.gov>; Maria Bebenek <mbebenek@pa.gov>; Victor Landis <vlandis@pa.gov>

**Subject:** CRW - Additional Deliverables

Hi all,

We just received the attached deliverables from CRW. The team can review and discuss these deliverables along with the other materials that CRW shared earlier this week. The attachments are:

1. Solids/floatables: A memo describing CRW's program to address inlets, including estimated schedules, is attached.
2. AWTF capital projects: Attached are a spreadsheet of minor AWTF capital projects over the last several years, and a spreadsheet showing examples of minor capital projects that are planned for 2022 and 2023.
3. Decentralized green/gray examples: A document is attached that describes the efforts that are being undertaken in priority planning areas, including listings of specific projects. CRW does not intend for these examples to be included in App. B.
4. Outfall activation monitoring: A memo is attached that describes CRW's plan to install monitoring technology at 10 representative sites in the system, to provide outfall activation information.
5. Agreements with City: CRW has provided lists of City/CRW agreements as well as changes to CRW rules and regulations below: **Ex. 5 AC/AWP**

City/CRW Agreements

- 11/04/2013 CRW/City entered into Transition Agreement – Operation and Maintenance of AWTF and Conveyance System from City to CRW.
- 12/04/2013 CRW/City entered into Transfer Agreement – CRW owns, operates and maintains the Collection System and subsurface portions of the MS4 with the City maintaining ownership of the remainder of the MS4.
- 10/1/2014 Intergovernmental Cooperation Agreement
- The Water-Sewer Transfer-Transition Agreements were also recorded with the Dauphin County Recorder of Deeds on 3/18/2016.

Rules and Regulations of CRW

- Drinking Water Rules and Regulations re: Provision of Services for Drinking Water and Water Shut-Offs – Adopted via Resolution No. 2017-100 on 9/27/2017

- Drinking Water Rules and Regulations effective 6/1/2019 – Adopted via Resolution No. 2019-027 on 5/22/2019
- Drinking Water Rules and Regulations – Tapping Fee Credit effective 10/1/2020 – Adopted via Resolution No. 2020-053 on 9/23/2020
- Rules and Regulations of the Wastewater System – Adopted via Resolution No. 2014-016 on 6/25/2014
- Rules and Regulations for Stormwater System – subject to 30-day period for public notice and comment until 1/16/2015 – Adopted via Resolution No. 2014-030 on 12/17/2014
- Wastewater and Stormwater Rules and Regulations Appendix Forms – Adopted via Resolution No. 2019-048 on 11/20/2019
- Wastewater and Stormwater Rules and Regulations effective 2/1/2020 – Adopted via Resolution No. 2020-002 on 1/22/2020
- Wastewater and Stormwater Rules and Regulations effective 10/1/2020 – Adopted via Resolution No. 2020-052 on 9/23/2020
- Amendment to Wastewater and Stormwater System Rules and Regulations – Maintenance – Sewer Laterals, Storm Laterals, and Surface Outlets, effective 1/1/2021 – Adopted via Resolution No. 2020-056 on 10/28/2020

Thanks,  
Devon

Devon Ahearn (she/her)

Trial Attorney

Environmental Enforcement Section | ENRD | U.S. Department of Justice

Regular Mail: P.O. Box 7611, Washington, DC 20044-7611

Overnight and Courier: 150 M Street NE, Suite 2.900, Washington, DC 20002

[Devon.ahearn@usdoj.gov](mailto:Devon.ahearn@usdoj.gov)

(202) 514-2717